

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**PENOVIA LLC**

**Plaintiff,**

**v.**

**HEWLETT-PACKARD COMPANY**

**Defendant.**

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**Civil Action No. 2:14-CV-00176**

**DEFENDANT HEWLETT-PACKARD COMPANY'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME TO RESPOND  
TO PLAINTIFF'S ORIGINAL COMPLAINT**

Defendant Hewlett-Packard Company files this Unopposed Motion for an Extension of Time to Respond to Plaintiff Penovia LLC's ("Plaintiff") Complaint and show:

1. Plaintiff has agreed, subject to the Court's approval to allow Hewlett-Packard Company Defendant a thirty (31) day extension of time, up to and including, Monday, June 9, 2014, to respond in any manner whatsoever including by way of answer, motion or other pleadings of any type to Plaintiff's Original Complaint.

2. This extension is not sought for the purpose of delay but for good cause, as to allow the Parties' to continue efforts to resolve the dispute before the Defendant must respond to Plaintiff's Original Complaint. The parties are in earnest discussions to resolve the dispute

3. Accordingly, Hewlett-Packard and Penovia move this Court to grant this unopposed request for a thirty (31) day extension of time to respond in any manner whatsoever including by way of answer, motion or other pleading of any type to Plaintiff's Original Complaint.

PREMISES CONSIDERED, Defendant Hewlett-Packard Company requests that the time to answer, move or otherwise respond to Plaintiff's Original Complaint be extended up to and including June 9, 2014, and for such other and further relief as the Court deems suitable and just.

Dated: April 29, 2014

Respectfully submitted,

**MANN | TINDEL | THOMPSON**  
300 West Main Street  
Henderson, Texas 75652  
(903) 657-8540  
(903) 657-6003 (fax)

By: /s/ J. Mark Mann

**J. Mark Mann**  
State Bar No. 12926150  
**G. Blake Thompson**  
State Bar No. 24042033

**ATTORNEYS FOR DEFENDANT  
HEWLETT-PACKARD COMPANY**

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and this Court's Orders, and this motion is unopposed. The parties met and conferred on April 24, 2014. The parties were able to agree that the relief sought by this motion should be granted, and agreed that this motion is necessary.

/s/ J. Mark Mann  
**J. Mark Mann**

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE]- Document Filing System, to all counsel of record, on this 29th day of April, 2014.

/s/ J. Mark Mann  
**J. Mark Mann**